

FILED
TIME 11:13 AM

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

MAR 30 2016
RICHARD W. NAGEL
Clerk of Court
CINCINNATI, OHIO

IN RE:

**GRAND JURY PROCEEDINGS
(GJ-1-15-1)**

MAGISTRATE NO.

1116MJ -173

**APPLICATION FOR EX PARTE
ORDER TO DISCLOSE RETURNS
TAXPAYER RETURN
INFORMATION**

Comes now the United States Attorney for the Southern District of Ohio, pursuant to 26 U.S.C. § 6103(i)(1), and makes application to the Court for an ex parte order directing the Internal Revenue Service to disclose to applicant (and others hereinafter named) returns and taxpayer return information, including, but not limited to, Forms 1040, 1040X, 1065, 1120s, 1099s and/or W2s, and related information, of:

- (1) NAME: **Christopher Leroy Carson**
SSN: **288-82-7040**
- (2) NAME: **Auto Sign & Drive LLC**
ADDRESS: **260 Northland Blvd., Cincinnati, Ohio 45246**
EIN: **47-5605254**
- (3) NAME: **TMAX Events LLC**
ADDRESS: **10207 Constitution Dr, Cincinnati, Ohio 45215**
EIN: **26-4246733**
- (4) NAME: **Team Max LLC**
ADDRESS: **10207 Constitution Dr, Cincinnati, Ohio 45215**
EIN: **46-2418605**
- (5) NAME: **Robin K. Fields**
ADDRESS: **10207 Constitution Dr, Cincinnati, Ohio 45215**
SSN: **402-82-4725**
- (6) NAME: **Herman Brunis III**
ADDRESS: **1190 Oldwick Dr, Cincinnati, Ohio 45215**
SSN: **297-66-5648**

(7) **NAME:** **Gina Martin-Brunis**
ADDRESS: **1190 Oldwick Dr, Cincinnati, Ohio 45215**
SSN: **283-84-1147**

(8) **NAME:** **Basement Investment Group LLC**
ADDRESS: **5704 Kingsway Ct, Cincinnati, Ohio**
FEIN: **46-0791970**

(9) **NAME:** **Level Lounge**
ADDRESS: **10207 Constitution Dr, Cincinnati, Ohio 45215**
FEIN: **47-1472680**

(10) **NAME:** **Plush LLC**
ADDRESS: **1190 Oldwick Dr, Cincinnati, Ohio 45215**
FEIN: **27-4664092**

(11) **NAME:** **Plush Grill, LLC**
ADDRESS: **1190 Oldwick Dr, Cincinnati, Ohio 45215**
FEIN: **45-3417128**

(12) **NAME:** **Dubai Real Estate Development, LLC**
ADDRESS: **7617 Reading Road, Cincinnati, Ohio**
FEIN: **45-2967628**

(13) **NAME:** **Front Row Bar and Grill, LLC**
ADDRESS: **2412 Catalpa Drive, Dayton, Ohio**
FEIN: **47-1387298**

(14) **NAME:** **Roxys**
ADDRESS: **11473 Chester Road, Cincinnati, Ohio**
FEIN: **46-5378515**

which returns and taxpayer return information are described as those returns and return information for the taxable periods 2009, 2010, 2011, 2012, 2013, 2014, and 2015.

In support of his application, applicant alleges and states the following:

1. There is reasonable cause to believe, based upon information believed to be reliable, that violations of 18 U.S.C. § 1956(a)(1)(B)(i), 18 U.S.C. § 1956(h), 18 U.S.C. § 1957, 21 U.S.C. § 841, and/or 21 U.S.C. § 846 have been committed.
2. There is reasonable cause to believe that the above-described returns and return information are or may be relevant to a matter relating to the commission of such act.

3. On or about December 4, 2015 and continuing through January 13, 2016, twelve vehicles were purchased with an aggregate value in excess of \$600,000. The vehicles were purchased by Jessica Buchannon and are all registered to Buchannon. Investigators have received information that the vehicles are actually owned by Christopher Carson as identified above. Some of these vehicles were purchased out of state, and on multiple occasions, Christopher Carson was the individual on who had the vehicles inspected. Between December 4, 2015 and March 13, 2016, several of these vehicles have been involved in high-speed pursuits with the Cincinnati Police Department. Most of the pursuits end without the apprehension of the vehicle, however, on two occasions Cincinnati Police was able to stop the vehicles. During both of these traffic stops, narcotics were found, including heroin and marijuana. Buchannon and Carson have told police that they operate a Rental Car company, namely Auto Sign and Drive, and they merely rent these vehicles to interested parties.

4. Information obtained from the lienholders of the vehicles indicates that Buchannon is an employee of Plush Nightclub. Based on records from the Ohio Secretary of State, Plush Nightclub is owned by Christopher Carson, Daryl Smith (Brother of Carson), and Herman Brunis III. Additional research from the Ohio Secretary of State indicated that Carson and Brunis have interest in several other clubs located within the Cincinnati and surrounding areas. Smith was recently released from prison on charges of Drug Trafficking. Investigators have received information that Brunis, Smith, and Carson are using narcotics proceeds to bring in hip-hop entertainers to their various nightclubs. These entertainers sometimes charge up to \$100,000 to perform for a single night. Robin Fields, as identified above, is thought to be a facilitator in the laundering of drug proceeds for the individuals and clubs noted above. Fields has been identified as the "money person" for Brunis and has deposited a significant amount of cash into the bank accounts of Brunis. Fields is also the registered agent on most of the companies Brunis owns.

5. Based on the knowledge, training and experience, and that of senior agents with whom I have conferred, I know that:

- a. Individuals engaging in illegal activities will often underreport income to local, state, and federal taxing authorities.
- b. Often, people engaging in specified illegal activities will have a cash hoard to pay expenditures to include personal and business expenses

6. Based on the aforementioned paragraphs, experience, and knowledge, it is the belief of your applicant that Carson and Brunis are engaged in income producing specified illegal activities as well as engaged in the laundering of proceeds from these activities to support their Nightclubs and Rental Car Business.

7. The returns and return information are sought exclusively for use in a Federal criminal investigation or proceeding concerning such act and related forfeiture proceedings.

8. The information sought to be disclosed cannot reasonably be obtained, under the circumstances, from another source.

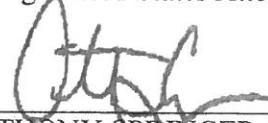
Assistant U.S. Attorneys Anthony Springer and Matthew Horwitz, Internal Revenue Service Special Agent Stephen D. Wajert, assisted by Paralegal Michelle Kamphaus and Paralegal Michelle Ewing, are personally and directly engaged in an investigation (including a grand jury investigation) of one or more federal crimes, including, but not limited to, violations of 18 U.S.C. § 1956(a)(1)(B)(i), 18 U.S.C. § 1956(h), 18 U.S.C. § 1957, 21 U.S.C. § 841, and/or 21 U.S.C. § 846, which may result in a judicial or administrative proceeding pertaining to the enforcement of such statutes, including, but not limited to, civil (21 U.S.C. § 881) and/or criminal (21 U.S.C. § 853) forfeiture proceedings related to such statutes. The information sought herein is solely for our use for that purpose. No disclosure will be made to any other person except in accordance with the provisions of 26 U.S.C. § 6103 and 26 C.F.R. § 301.6103(i)-1.

This application is authorized by Benjamin C. Glassman, Acting United States Attorney for the Southern District of Ohio.

Therefore, applicant prays that this Court enter an order, ex parte, on this application granting disclosure by the Internal Revenue Service of the returns and taxpayer return information specified in this application.

Respectfully submitted,

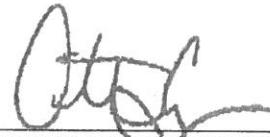
BENJAMIN C. GLASSMAN
Acting United States Attorney



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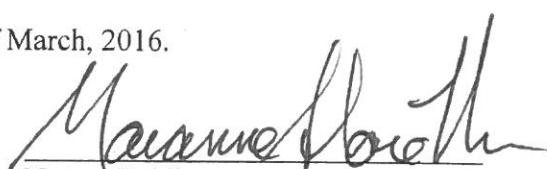
VERIFICATION

I, Anthony Springer, being first duly sworn, depose and say that I am an Assistant U.S. Attorney for the Southern District of Ohio and that the foregoing application is made on the basis of information officially furnished and upon the basis of such information is true as I verily believe.



ANTHONY SPRINGER
Assistant U.S. Attorney

Subscribed and sworn before me this 29th day of March, 2016.



Notary Public

My commission expires on 11/02/2016.

MARIANNE SHORE-KUHN
Notary Public, State of Ohio
My Commission Expires Nov. 2, 2016

AUTHORIZATION

I, Benjamin C. Glassman, Acting United States Attorney for the Southern District of Ohio, state that the foregoing application is authorized by me pursuant to the provisions of 26 U.S.C. § 6103(i)(1)(B).

Benjamin C. Glassman
BENJAMIN C. GLASSMAN
Acting United States Attorney